

REMARKS

The above amendments and following remarks are submitted in response to the Official Action of the Examiner mailed October 21, 2005. Having addressed all objections and grounds of rejection, claims 1-20, being all the pending claims, are now deemed in condition for allowance. Reconsideration to that end is respectfully requested.

The Examiner has objected to claim 1 as "vague". In response thereto, claim 1 has been amended as recommended by the Examiner.

Claims 1-5 and 11-15 have been rejected under 35 U.S.C. 112, second paragraph, in view of certain informalities. In response thereto, claims 1, 4, and 11 have been amended above as recommended by the Examiner.

Claims 1-20 have been rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,058,264, issued to Glaser (hereinafter referred to as "Glaser"). This ground of rejection is respectfully traversed as to amended claims 1-20 for the following reasons.

The standards for a finding of anticipation during examination are specified in MPEP 2131, which provides in part:

TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH
EVERY ELEMENT OF THE CLAIM

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference."
Verdegaal Bros. v. Union Oil Co. of California, 814

F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).
"The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). (emphasis added)

The rejection is respectfully traversed because Glaser does not show "the identical invention" "in as complete detail as is contained in the claim[s]" as required by MPEP 2131.

Though there are numerous differences between Applicant's claimed invention and the disclosure of Glaser, the Examiner may wish to consider Development Computer 400 of Glaser (see Fig. 4). As explained at column 5, line 14, through column 6, line 23, Development Computer 400 provides the "development environment" for Glaser. This environment of Glaser apparently provides a single location for development of a Graphical User Interface (GUI) for developing "extenders" for a plurality of data base management systems without using the facilities of the data base management systems.

Applicant's claimed invention, on the other hand, is directed to providing a plurality of Graphical User Interfaces for a given data base management system primarily using the resources of the data base management system. The advantages or relying upon the power of the data base management system to construct the GUI are discussed throughout Applicant's

disclosure, and the approach is summarized at page 10, lines 20-21:

In accordance with the present invention, a customized user interface is built from multiple components stored in the proprietary database management system.

As a result, there are any number of limitations to be found within Applicant's claims, as amended, specifically directed to this distinction which are not found in Glaser.

Claim 1, as amended, requires at element b, "wherein said user terminal builds and stores within said data base for future use a service request". In clearly erroneously finding this element within Glaser, the Examiner cites the irrelevant column 9, lines 14-26. The citation at column 9, lines 14-20, is totally irrelevant, because it refers to "a dynamic link library" which is clearly not created in accordance with the extender and does not indicated where it is stored. The remainder of the citation discusses script without regard to where it is stored and which "enables a table" rather than be created from a table as claimed. It is not understood why the Examiner considers this citation relevant to the claimed element, but it is clear that the citation does not meet the requirements of MPEP 2131.

As amended, the third element is limited by a "Data Wizard" located within the claimed data base management system. Thus, the claimed invention utilizes the power of the claimed data base management system to construct the "service requests" used to direct the data base management system. On the other hand, the

creation of the "extender" occurs within the development computer 400 of Glaser.

Claim element c also requires that each step be "encapsulated within its own environment" permitting each step to be separately and independently edited with the claimed Data Wizard. This functionality is summarized in the specification at page 12, line 21, through page 13, line 9, and described in detail in Figs. 25-35 with corresponding detailed description at pages 57-67.

Glaser has no provision for accommodating these developmental features. Therefore, the Examiner cites Figs 7A-7C and corresponding text of Glaser. Though the Examiner appears to focus on the ability of Glaser to select an "attribute", there is no showing that any particular selected "attribute" is associated with a single step of the "extender" being created as claimed. In fact, it is clear that the opposite is true. Selection of an "attribute" of Glaser means selection of that "attribute" for all of the "extender". Surely, the Examiner can distinguish between the claimed modifying of a portion (i.e., step) of the claimed service request and the action of Glaser to select an "attribute" for all of the "extender".

In accordance with the remainder of her findings with regard to the third claim element (i.e., element c), it is clear that the Examiner has simply refused to consider the claimed

invention. For example, the claim requires that the claimed Data Wizard "permits said user to build said service request as a table". Instead of addressing this limitation, the Examiner Glaser column 6, lines 1-12, and column 9, lines 36-40. Taken together, these citations mention "table" a total of once, at column 6, line 8, stating:

.....a set of administrative support tables.....

Though Glaser does not define "a set of administrative support tables", it is clear that they do not, of themselves, define a "service request" as required by Applicant's invention. The extender of Glaser is somehow comprised of UDT's, UDF's, and "triggers" (see column 6, lines 4-9).

The rejection of claim 1 as amended, and all claims depending therefrom, is respectfully traversed for failure of Glaser to show "the identical invention" "in as complete detail as is contained in the claim" as required by MPEP 2131.

Claim 6 requires:

....wherein each of said ordered sequence of discrete and independent steps exists within its own encapsulated environment such that each of said ordered sequence of discrete and independent steps may be user modified independently of others of said ordered sequence of discrete and independent steps.

As explained above, Glaser does not provide this feature for service development. Therefore, the Examiner again cites material to suggest that Glaser can add or delete "attributes"

from an entire "extender" being created. And again it is apparent that the Examiner has not distinguished between adding or deleting an "attribute" from an entire "extender" and modifying a step of a service request without modifying other steps of that same service request. The rejection of amended claim 6, and all claims depending therefrom, is respectfully traversed.

Claims 2 and 7 depend from claims 1 and 6, respectively, and further limit the claimed network. Glaser cannot meet the limitations of claims 1 and 6 for the reasons provided above. Therefore, Glaser cannot meet the further limitations of claims 2 and 7. The rejection of claims 2 and 7 is respectfully traversed.

Claims 3, 9, and 13-14 depend from claims 2, 8 and 12, respectively, and further limit the software architecture of the claimed user terminal. In making her rejection, the Examiner cites Glaser, Fig. 1, element 102. Fig. 1 says nothing of the software architecture of Client Computer 102. It could be a MACINTOSH computer, having a commercially available browser; it could be a DEC, computer having a commercially available browser; etc. In fact, Glaser does not define the software architecture of Client Computer 102 anywhere. Therefore, the rejection of claims 3, 9, and 13-14 is respectfully traversed, because Glaser

does not show "the identical invention" "in as complete detail as is contained in the claim[s]" as required by MPEP 2131.

Claims 4, 8, and 12 depend from claims 3, 7, and 11, respectively, and are further limited wherein the claimed "Data Wizard" automatically inhibits presentation of invalid steps. Applicant's prohibit presentation of invalid steps. In other words, invalid steps are not displayed at all. Glaser, on the other hand, displays invalid steps, but offers the user the opportunity to delete invalid steps after displayed. Thus, Glaser displays invalid steps and Applicant's claimed invention never does.

In making her rejection, the Examiner admits the claimed functional distinction between Glaser and the claimed invention, but makes a claim to inherency which does not comply with the requirements of MPEP 2112 stating:

Glaser inherently discloses said Data Wizard automatically inhibits presentation of any step which would not be valid for the corresponding position within said ordered sequence as when the user want (sic) to add or delete or update attributes (Fig. 7C for example) the following ordered sequence step such as the one in Fig. 7D would be automatically adjusted accordingly. For example, when the add button 714 or the update button 718 are selected, the next smart guide window 448 would display appropriate step of defining attributes based on the added or updated attribute. By doing so, it automatically inhibits presentation of any next step that (sic) being not corresponded (sic) to the added or updated attribute.

It is absolutely bizarre and contrary to controlling law for the Examiner to "manufacture" such pseudo-evidence. It is respectfully submitted that Fig. 7D does not disclose all of this "manufactured" material which the Examiner alleges is disclosed by it.

However, the functional differences admitted by the Examiner correspond to actual structural differences. The structure of Applicant's claimed "Data Wizard" is different from the structure of Glaser's "Extender Smart Guide" in that Applicant's invention prevents display of invalid steps whereas Glaser's does not. It is these structural differences which render Applicant's claimed invention patentable over Glaser in accordance with MPEP 2131. The rejection of claims 4, 8, and 12 is respectfully traversed.

Claims 5, 10, and 15 depend from claims 4, 9, and 14, respectively, and further limit the claimed "data base management system" to a "commercial" system. In making her rejection, the Examiner cites Glaser, column 3, lines 49-56, holding that Glaser "is primarily targeted to enterprise customers". Surely, the Examiner can distinguish between the claimed "commercial" system which may or may not be an enterprise system and Glaser's "enterprise customers" which may or may not use the claimed "commercial" system.

Instead, the Examiner states:

Since (sic) the system targets on (sic) enterprise customers, the system relating to economic business (sic) thus a database management system of Glaser is commercially).

This statement, to the extent understandable, is legally irrelevant, because it does not address Applicant's claimed invention. The rejection of claims 5, 10, and 15 is respectfully traversed.

Claim 11, as amended, is an independent method claim having eight basic method step limitations. As explained above, Applicant's invention prevents only valid steps. Glaser does not distinguish between valid and invalid steps.

Furthermore, claim 11 upon selection of a step requires modification of that chosen step. This feature is also not found within Glaser. As explained above, Glaser does not and cannot modify a single step, independent of other steps. In addition, Glaser does not have the "storing" step. As discussed above, the Examiner has confusingly cited column 9, lines 21-26, which simply does not address the claimed invention. The rejection of amended claim 11, and all claims depending therefrom, is respectfully traversed.

Claim 16 is an independent apparatus claim having five separate "means-plus-function" limitations. Claim 16 requires that the claimed "steps" are encapsulate within their own environments to permit individual editing without impact upon

other steps. As explained above, this feature is not found in Glaser. Claim 16, as amended, requires that the "designing means" be located within the claimed "providing means". Glaser clearly utilizes only development computer 400. The rejection of claim 16, and all claims depending therefrom, is respectfully traversed.

Claim 17 depending from claim 16 and is further limited by an "inhibiting means". As explained above, this is distinguishable from the "delete button" in that claim 17 prevents display of invalid steps and the delete button of Glaser does not prevent display but only provides a subsequent erasing of a previously displayed element. The rejection of claim 17 is respectfully traversed.

Claim 18 depends from claim 17 and further limits the claimed network. Glaser cannot meet the limitations of claim 17 for the reasons provided above. Therefore, Glaser cannot meet the further limitations of claim 18. The rejection of claim 18 is respectfully traversed.

Claim 19 depends from claim 18 and further limits the claimed "data base management system" to a "commercial" system. In making her rejection, the Examiner cites Glaser, column 3, lines 49-56, holding that Glaser "is primarily targeted to enterprise customers". Surely, the Examiner can distinguish between the claimed "commercial" system which may or may not be

an enterprise system and Glaser's "enterprise customers" which may or may not utilize the claimed "commercial" system. The rejection of claim 19 is respectfully traversed.

Claim 20 depends from claim 19 and further limits the software architecture of the claimed user terminal. In making her rejection, the Examiner cites Glaser, Fig. 1, element 102. Fig. 1 says nothing of the software architecture of Client Computer 102. In fact, Glaser does not define the software architecture of Client Computer 102 anywhere. Therefore, the rejection of claim 20 is respectfully traversed.

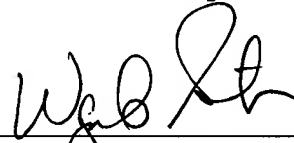
Having thus responded to each objection and ground of rejection, Applicant respectfully requests entry of this amendment and allowance of claims 1-20, being the only pending claims.

Please charge any deficiencies or credit any overpayment to Deposit Account No. 14-0620.

Respectfully submitted,

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